

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re:</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>,</b>	:
<b>f/k/a General Motors Corp., <i>et al.</i></b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

**Chapter 11 Case No.**

**09-50026 (REG)**

**(Jointly Administered)**

**OBJECTION TO APPROVAL OF DEBTOR'S  
PROPOSED DISCLOSURE STATEMENT  
WITH RESPECT TO DEBTOR'S JOINT CHAPTER 11 PLAN**

**NOW INTO COURT**, via undersigned representative, comes **Estate of Jeanne Heloise Lind King**, having just this day been informed of this matter, to object to any approval of the Debtor's proposed disclosure statement with respect to its Joint Chapter 11 Plan for the following reasons:

**I.**

Jeanne Heloise Lind King purchased 64 shares of Common Stock in the Debtor's prior corporate entity, General Motors Corporation. She also purchased one share of GM Class H Common Stock.

**II.**

Ms. King and multiple thousands of investors supported General Motors Corporation (GM) through their stock ownership and loyalty over the years. They contributed substantially to the growth and sustainability of GM.

**III.**

Ms. King is now dead. A succession was opened on her behalf in Civil District Court for the Parish of Orleans, Louisiana, Case Number 97-11518 "A" (5). Numerous attempts to redeem

the stock for cash were made by her daughter, H. Jeanne King Dimmock, the first administratrix, and by Stephen N. Chesnut, attorney for the estate and subsequent administrator. Original certificates were stamped with the "Medallion Guarantee" of authenticity by local banks and sent to the transfer agent. Numerous phone calls did not produce positive results.

IV.

Motors Liquidation Company, as a successor to GM, has a duty and obligation to liquidate the debts and pay the claims, including that of the Estate of Jeanne H.L. King.

V.

Estate of Jeanne H.L. King has not be informed of the many of the pleadings and hearings in these proceedings. No notice or opportunity to respond has been provided to said Estate, thereby violating its right to due process.

VI.

Until the above described claim is satisfied, Estate of Jeanne Heloise Lind King strongly objects to any plan of reorganization of the debtor under Chapter 11 of the U.S. Bankruptcy Code.

RESPECTFULLY SUBMITTED:

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STEPHEN N. CHESNUT (LA 19309)  
Executor/Administrator and Attorney for  
the Estate of Jeanne H.L. King  
1413 Chartres Street, Suite A  
New Orleans, Louisiana 70116  
Telephone and Fax: (504) 945-9000  
Email: chesnutlawfirm@earthlink.net

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**AFFIDAVIT OF SERVICE**

STATE OF LOUISIANA )

PARISH OF ORLEANS )

I, Lee Hoz, do hereby swear, affirm, depose and state:

1. I am the legal assistant for the Stephen N. Chesnut, attorney and administrator for the Estate of Jeanne Heloise Lind King, holder of an equity stock interest in the above captioned proceeding. Our business address is 1413 Chartres Street, Suite A; New Orleans, Louisiana 70116.
2. On October 14, 2010, in the morning, I served a copy of the foregoing "Objection to Approval to Debtor's Proposed Disclosure Statement with respect to Debtor's Proposed Chapter 11 Plan" via electronic mail (email), facsimile transmission and first class United States mail and/or electronic submission on the parties identified on Exhibit A and annexed hereto on the date below indicated. .

Dated: October 14, 2010, \_\_\_\_\_ a.m. E.T.

New Orleans, Louisiana

/s/ Lee Hoz

LEE HOZ

Sworn to before me on this 14<sup>th</sup> day of October, 2010, at \_\_\_\_\_ a.m.

/s/ Stephen N. Chesnut

STEPHEN N. CHESNUT

Notary Public in and for the

State of Louisiana,

Residing in Orleans Parish.

My commission is issued for life.

No. 1605

**EXHIBIT A**

Hon. Clerk of Court  
U.S. Bankruptcy Court for the  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

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Stutzman, Bromberg, Esserman & Plifka,  
A Professional Corporation  
Attorneys for Dean M. Trafelet, in his  
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